



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**AUG 03 2010**

Ref: 8EPR-N

Jamie Kingsbury, District Ranger  
Hahns Peak/Bears Ears Ranger District  
Medicine Bow-Routt National Forests  
925 Weiss Drive  
Steamboat Springs, CO 80487

RE: EPA Comments on Final Environmental  
Impact Statement, Willow Creek Pass Fuel  
Reduction Project, CEQ #20100261

Dear Mr. Kingsbury:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the July 2010 Final Environmental Impact Statement (FEIS) for the Willow Creek Pass Fuel Reduction Project. This FEIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Medicine Bow-Routt National Forests to assess and disclose potential environmental impacts associated with removal of dead and dying conifer trees along the shared Hahns Peak/Bears Ears Ranger District public/private boundary with the Willow Creek Pass Subdivision in Routt County, Colorado. The dead and dying trees are the product of the mountain pine beetle epidemic, and the preferred alternative would implement fuel reduction treatments on 81 acres in the Dome Peak Inventoried Roadless Area (IRA) adjacent to private homes.

EPA provided comments on the Draft Environmental Impact Statement (DEIS) with an October 1, 2009 letter. As described in the DEIS, the original preferred Alternative 2 would have included approximately 0.25 mile of temporary road construction in order to access and transport the targeted hazard trees. In addition, this alternative included the burning of slash piles created from timber harvesting methods. EPA recommended that any smoke impacts on the nearby subdivision and Class I Federal areas should be discussed. EPA also made recommendations for additional discussion regarding smoke mitigation techniques; meteorological conditions favorable for burning; alternatives to burning; smoke monitoring; and public notification requirements.

The FEIS includes changes to the DEIS that the USFS made in response to comments received. Specifically, the USFS developed a new Alternative 2 (Preferred Alternative), which targets hazard trees that will be skidded to, and treated at, processing areas in the south and

central sections of the project area. These processed trees will then be forwarded to landing areas (located on private lands within the Willow Creek Pass Subdivision) for removal or burning. Due to the use of mechanized equipment and forwarding operations, no road construction in the Dome Peak IRA would be necessary. Lack of access to the north portion of the project area (approximately 13 acres) requires that hazard trees be felled but not removed, although some piling and burning also may occur in this area.

Based on our review of the revisions made between the DEIS and the FEIS in response to public comments, EPA is pleased that recommendations for slash burning have been incorporated. Specifically, the addition of Appendix B, Prescribed Burning and Smoke Management, outlines requirements for the burning of slash piles, including coordination with the State of Colorado Air Pollution Control Division for an open burning permit. Such an open burning permit will include requirements for appropriate meteorological conditions that reduce impacts of smoke through dispersal, as well as requirements for monitoring of sensitive receptors and public notification of burning operations. In addition, the USFS will consider alternatives to burning throughout project implementation.

We appreciate the opportunity to review this FEIS and your incorporation of our recommendations regarding slash burning. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Svoboda', with a stylized flourish extending from the end.

Larry Svoboda  
Director, NEPA Program  
Ecosystems Protection and Remediation